

From: "Novak, Madi" <Novak.Elisabeth@epa.gov>  
To: "DAUGHERTY Katie" <Katie.J.DAUGHERTY@state.or.us>  
CC: David.J.LACEY <David.J.LACEY@state.or.us>  
"Peterson, Lance" <peterstone@cdmsmith.com>  
Date: 1/25/2021 11:07:41 AM  
Subject: RE: Comments on Arkema revised PDI

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Thank you Katie, I'll include this in our comments on the revised PDI work plan.

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**From:** DAUGHERTY Katie <Katie.J.DAUGHERTY@state.or.us>  
**Sent:** Wednesday, January 20, 2021 8:28 AM  
**To:** Novak, Madi <Novak.Elisabeth@epa.gov>  
**Cc:** David.J.LACEY <David.J.LACEY@state.or.us>; Peterson, Lance <peterstone@cdmsmith.com>  
**Subject:** Comments on Arkema revised PDI

Hi Madi,

In looking through the revised in-water PDI, DEQ would like to provide the following comments:

Comment S19a – This comment was not address in the text of the PDI work plan.

Comment S19b - the statement in 2.7.4.1 remains incorrect.

**“2.7.4.1 Riverbank Characterization**

Results of these studies were used in an upland Level II screening ecological risk assessment conducted at the Arkema Site in 2009. The Level II screening ecological risk assessment did not provide conclusions related to unacceptable risk to burrowing mammals (see the Arkema Upland Level II Screening Ecological Risk Assessment; Integral 2009b).”

The conclusions about eco risk presented in the Integral 2009b report referenced above were supersede by a June 2011 addendum (attached).

Integral’s June 17, 2011 *Addendum to January 16, 2009 Arkema Upland Level II ERA Ecological Soil Screening Level Values for PCDDs and PCDFs*

Conclusion states...“Depending on the receptor and the toxicity endpoint, soil SLVs for the 2,3,7,8-TCDD congener range from  $1.6 \times 10^{-6}$  mg/kg dw soil to  $7.2 \times 10^{-5}$  mg/kg dw soil. Based on UCL90 concentrations for riverbank soils only total TCDD TEQ for small mammals is identified as a chemical of potential ecological concern. Comparisons with 10X LOAEL SLVs indicated that sample locations (RBC 3, RBC 9 and RBC 11) may be of concern in a hotspot evaluation.”

and also through agreements between DEQ/LSS captured in the attached 2017 DEQ comments on FS WP specific comment 6 (PDF page 4) and Attachment 3 (PDF page 27)

Please let me know if you have any questions on the comments.

Thanks

Katie Daugherty, R.G.  
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NWR Cleanup and Tanks

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